

UNITED STATES DISTRICT COURT

for the
Southern DISTRICT OF Indiana

CLERK
DISTRICT COURT
INDIANAPOLIS DIVISION
2012 MAY 14 PM 4:55
SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
CLERK

SCR Solutions, Inc,
Michael Ware, President

Plaintiff(s)

v.

H2o Underpressure Inc,
Chris Koga, CEO

Defendant(s)

Civil Action No.

4:12-cv-0056 RLY-WGH

COMPLAINT FOR WILLFUL PATENT INFRINGEMENT

COMES NOW, Michael P. Ware, Jr., President of SCR Solutions, Inc., plaintiff, in Pro Se, and files this Complaint For Willful Patent Infringement, and states:

1. Statement of Jurisdiction.

a. The plaintiff is a citizen of the State of Indiana and a corporation incorporated under the laws of the State of Delaware, with its principal place of business in the State of Indiana. The defendant is a citizen of the State of Wisconsin and a corporation incorporated under the laws of the State of Wisconsin, with its principal place of business in the State of Wisconsin. The amount in controversy, without interest and costs, exceeds the sum or value specified by 28 U.S.C. § 1332.

b. This action arises under a federal statute, 17 U.S.C. § 504.

2. On Feb. 16, 2012 United States Provisional Patent No. 61/633,642 were issued to the plaintiff for an invention in a Manual SCR Catalyst Cleaning Method. The plaintiff owned the patent throughout the period of the defendant's infringing acts and still owns the patent.

3. The defendant has infringed and is still infringing the Letters Patent by selling, and using Manual SCR Catalyst Cleaning Method to the Duke Energy East Bend Power Plant in Union Kentucky, that embody the patented invention, and the defendant will continue to sell and use so unless enjoined by this court.


4. The defendant has had previous knowledge of plaintiff's ownership of the patent pending process and has conspired to steal and use so without written agreement or intention to compensate the owner, SCR Solutions, Inc, for the sell or use of the patent pending Manual SCR Catalyst Cleaning Method.

5. The plaintiff has complied with the statutory requirement of placing a notice of the Letters Patent on all Manual SCR Catalyst Cleaning Method sells and has given the defendant written notice of the infringement.

Therefore, the plaintiff demands:

- (a) a preliminary and final injunction against the continuing infringement;
- (b) an accounting for damages; and
- (c) interest and costs.

Date: May 11, 2012



Michael P. Ware, Jr.
President SCR Solutions, Inc.
2526 Franks Drive, Madison, In 47250
m.ware@scrsolutions.us
812-274-4328

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on May 11, 2012, the foregoing Complaint for Willful Patent Infringement was served, via U.S. mail, postage paid, and addressed to the following:

Hesson & Birch LLC
244 E. Doty Ave, Nee Nah, WI 54956

H2O Under pressure, ATTN: Chris Koga
N89 Depot Rd. P.O. Box 289, Dale, WI 54931

M. Ware Jr.

Michael P. Ware, Jr.

President/ SCR Solutions, Inc